

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:

YURI BIRG,  
DEBTOR

ILENE F. GOLDSTEIN, CHAPTER 7  
TRUSTEE,  
PLAINTIFF

v.

ILANA BIRG,

DEFENDANT

) Case No. 17-10670  
)  
)  
)  
)

) Honorable A. Benjamin Goldgar  
)  
)

) Adversary No. 19-00596  
)  
)

) Chapter 7  
)

**NOTICE OF UNCONTESTED MOTION**

To: William J. Factor, The Law Office of William J. Factor, Ltd., 105 W. Madison St., Suite 1500, Chicago, IL 60602; [wfactor@wfactorlaw.com](mailto:wfactor@wfactorlaw.com)

**PLEASE TAKE NOTICE** that on January 4, 2021, at 9:30 a.m., I will appear before the Honorable A. Benjamin Goldgar, or any other Bankruptcy Judge who may be presiding in said Judge's place and stead, and will present the **Uncontested Motion of Defendant, Ilana Birg, to Extend Time to File Response to Plaintiff's Third Motion to Compel Discovery Responses and Extend Time for Plaintiff to File Her Reply**, a copy of which is attached hereto and herewith served upon you.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is **161 500 0972** and the passcode is **726993**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must

file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Ilana Birg, Defendant

By: /s/ Joel A. Schechter  
Her Attorney

Joel A. Schechter  
Attorney No. 3122099  
53 W. Jackson Blvd., Suite 1522  
Chicago, Illinois 60604  
(312) 332-0267  
[joel@jasbklaw.com](mailto:joel@jasbklaw.com)

**CERTIFICATE OF SERVICE**

The undersigned being first duly sworn on oath deposes and says that he served the above and foregoing notice and attached motion on the above-referenced party via the Court's CM/ECF System, on the 28th day of December, 2020, before the hour of 5:00 p.m. from 53 W. Jackson Blvd., Chicago, Illinois 60604.

/s/ Joel A. Schechter

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V.

ILANA BIRG,

**DEFENDANT**

**Case No. 17-10670**

**Honorable A. Benjamin Goldgar**

Adversary No. 19-00596

## Chapter 7

**UNCONTESTED MOTION OF DEFENDANT, ILANA BIRG, TO EXTEND TIME TO FILE  
RESPONSE TO PLAINTIFF'S THIRD MOTION TO COMPEL DISCOVERY RESPONSES**

NOW COMES Defendant, Ilana Birg (“Defendant”) by and through her attorney, Joel A. Schechter of the Law Offices of Joel A. Schechter, and moves the Court for the entry of an order extending the time to respond to the third motion of Plaintiff, Ilene F. Goldstein, not individually, but as Chapter 7 Trustee of the Estate of Yuri Birg, (“Plaintiff”) to compel discovery responses and to extend Plaintiff’s time to file reply and in support thereof, states as follows:

1. On April 4, 2017, the Debtor, Yuri Birg, filed a voluntary petition pursuant to Chapter 7 of Title 11, United States Code.
2. The Plaintiff is the duly qualified and acting Chapter 7 Trustee.
3. On April 3, 2019, the Plaintiff filed her complaint against Defendant seeking to avoid and recovery alleged fraudulent conveyances.
4. Defendant filed her answer to the complaint and the parties are conducting discovery.

5. On November 30, 2020, Plaintiff filed her third motion (“Motion”) to compel discovery responses.

6. On December 7, 2020, an order was entered setting a briefing schedule whereby Defendant was given leave to file her response on or before December 28, 2020, and Plaintiff was given leave to file her reply on or before January 4, 2021. The Motion is set for status on February 1, 2021, at 10:00 a.m.

7. Defendant’s counsel is unable to complete Defendant’s response in time for filing on December 28, 2020, and reached out to Plaintiff’s counsel for an agreed extension of time to file her response to and including January 4, 2021, and in consideration therefor, Defendant agreed to extend the time for Plaintiff to file her reply to January 11, 2021.

8. Plaintiff’s counsel has agreed to the amended briefing schedule and, therefore, the instant motion is filed as uncontested.

WHEREFORE, Defendant, Ilana Birg, prays the Honorable Court enter an order extending the time for Defendant to file her response to Plaintiff’s Motion to and including January 4, 2021, and extending the time for Plaintiff to file her reply to and including January 11, 2021, and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

Ilana Birg, Defendant

By: Joel A. Schechter  
Her Attorney

Joel A. Schechter  
Attorney No. 3122099  
Law Offices of Joel A. Schechter  
53 West Jackson Blvd., Suite 1522  
Chicago, IL 60604  
312-332-0267  
joel@jasbklaw.com